

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Update to Parts 2 and 25 Concerning Non-)	IB Docket No. 16-408
Geostationary, Fixed-Satellite Service Systems)	
and Related Matters)	

JOINT MOTION FOR EXTENSION OF TIME

Inmarsat, Inc., Intelsat Corporation, Iridium Satellite LLC, WorldVu Satellites Ltd. d/b/a OneWeb, SES Americom, Inc. and its subsidiary O3b Limited, Telesat Canada, and The Boeing Company (collectively, “Satellite Companies”) respectfully request that the Commission extend the deadline for filing replies to comments by 14 days, from March 27, 2017 to April 10, 2017. This would ensure that interested parties have sufficient time to address the varied and complex issues in this proceeding in order to provide the Commission with an appropriate record for decision.

Although requests for extension of time are not granted routinely,¹ the circumstances and equities in this case justify an extension in this case. The underlying *Notice of Proposed Rulemaking*² elicited sixteen responses from satellite operators and manufacturers regarding the current operations and the future of Non-Geostationary, Fixed-Satellite Service (“NGSO FSS”) technology. These filings raise complex technical propositions that will require significant effort to analyze. This analysis will need to consider not only the substance of the comments, but also

¹ See 47 C.F.R. § 1.46(a).

² *In the Matter of Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Notice of Proposed Rulemaking, 31 FCC Rcd 13651 (Dec. 15, 2016) (“NPRM”).

the potential significance of the substantial number of NGSO FSS system proposals that have been filed with the Commission, including applications that were just filed on March 1, 2017.

Further, many of the commenting parties suggested compromise approaches on certain issues that, given sufficient time to consider, other parties may be able to endorse to a full or limited extent. Without sufficient time to conduct such analysis for reply, parties will be unable to provide the Commission the fully developed record it needs to make an informed decision.

Given the equities involved, it would be appropriate for the Commission to grant parties an additional two weeks to prepare replies to comments. The benefits of this brief delay far outweigh any potential burden, as the broad scope of diverse technically complex issues involved justify allowing sufficient time for thoughtful analysis by affected parties and careful consideration by the Commission.

For the foregoing reasons, the Satellite Companies request that the Commission extend the filing deadline for replies to comments in this proceeding to April 10, 2017.

Respectfully submitted,

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